



Debevoise & Plimpton LLP
66 Hudson Boulevard
New York, NY 10001
+1 212 909 6000

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BY ECF AND EMAIL

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, No. 19 Civ. 9236 (S.D.N.Y.)

Dear Judge Failla:

We write on behalf of the B/T Defendants to seek permission to file under seal the B/T Defendants' Letter Motion for Leave to File a Sur-Reply and the Proposed Sur-Reply Memorandum, attached as Exhibit A to the motion (collectively, the "Sur-Reply Materials").

The Sur-Reply Materials discuss the Anonymous Trader and his trading strategies and activities. The Sur-Reply Materials also reference and characterize the Anonymous Trader's deposition and his declaration dated September 5, 2020, which was previously filed under seal at Dkt. No. 190. Moreover, the Sur-Reply Materials cite extensively to Plaintiffs' Proposed Second Amended Complaint and the parties' briefing on Plaintiffs' Motion for Leave to Amend (Dkt. Nos. 480, 480-1, 505, 515), all of which have been filed under seal. Consistent with the Court's prior Orders regarding the Anonymous Trader's confidentiality (Dkt. Nos. 195, 215, 420, 439), the B/T Defendants intend to confer with the Anonymous Trader regarding redactions to the Sur-Reply Materials and to file public versions promptly thereafter.

Respectfully submitted,

/s/ Elliot Greenfield